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Roots Ready Made Garments Co. W.L.L.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ROOTS READY MADE GARMENTS CO.
W.L.L.,

Plaintiff,

v.

THE GAP, INC., a/k/a, GAP, INC., GAP
INTERNATIONAL SALES, INC., BANANA
REPUBLIC, LLC, AND OLD NAVY, LLC,

Defendants.

Case No: C 07 3363 CRB

MISCELLANEOUS ADMINISTRATIVE
REQUEST TO FILE DOCUMENTS
UNDER SEAL; [PROPOSED] ORDER

Date: August 29, 2008
Time: 10:00 a.m.
Place: Courtroom 8, 19th Floor
Judge: Charles R. Breyer

Pursuant to Local Rule 79-5(c), Roots Ready Made Garments Co., W.L.L.

(“Roots”) hereby makes this Miscellaneous Administrative Request to File certain exhibits, and the portions of a document that refers to those exhibits (“the Documents”), Under Seal.

Plaintiff’s Opposition to Defendants’ Motion for Summary Judgment, or, in the Alternative, Summary Adjudication (the “Opposition Brief”) refers to deposition transcripts and documents that Defendants have designated confidential under the terms of the Protective Order entered by the Court on August 7, 2007. The Opposition Brief also refers to deposition transcripts and documents that Roots has designated as confidential pursuant to the Protective

1 Order entered by the Court on August 7, 2007. These deposition transcripts and documents
2 contain confidential business information, and Roots' business interests would be adversely
3 affected if the contents of the Documents were revealed to third parties outside this litigation.

4 True and correct copies of the referenced pages of these transcripts are attached
5 as Exhibits A, B, D, E, F, L, M, P, Q, R T, U and V to the Declaration of Bradley J. Nash in
6 Support of Plaintiff's Opposition to Defendants Motion for Summary Judgment, or in the
7 Alternative, Summary Adjudication (the "Nash Declaration.")

8 Because the deposition transcripts have been designated as "Confidential"
9 pursuant to Protective Order entered by this Court on August 7, 2007, and contain confidential
10 business information, Roots respectfully requests that:

11 (i) Exhibits A, B, D, E, F, L, M, P, Q, R T, U and V to the Nash Declaration be
12 filed under seal and lodged in accordance with Civil Local Rule 79-5(c) and (d);

13 (ii) The sealed version of the Opposition Brief, which refers to the contents of
14 the Documents, be lodged in accordance with Civil Local Rule 79-5(c) and (d).

15 Roots has also prepared a public version of the Opposition Brief and Declaration
16 of Bradley J. Nash in support thereof, which will be filed electronically. In the public version,
17 Roots has redacted only those portions that constitute or refer to the confidential material.

18 Respectfully submitted,

19 Dated: August 8, 2008

COVINGTON & BURLING LLP

20
21 /s/ Bradley J. Nash
BRADLEY J. NASH

22
23
24 **IT IS SO ORDERED.**

25
26 Dated: _____

27 BY: _____
CHARLES R. BREYER
United States District Judge